

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

---

**AETNA, INC., AETNA HEALTH  
INC., AETNA HEALTH  
MANAGEMENT, LLC, AND  
AETNA LIFE INSURANCE  
COMPANY,  
Plaintiffs,**

**v.**

**MEDNAX, INC., PEDIATRIX  
MEDICAL GROUP, INC., AND  
MEDNAX SERVICES, INC.,  
Defendants.**

---

:  
:  
: **Miscellaneous Action**  
:  
: **No.**  
:  
: **Eastern District of Pennsylvania**  
: **Civil Action No. 18-2217**  
:  
:  
:  
:  
:  
:

**AETNA’S MOTION TO COMPEL COMPLIANCE WITH THE  
SUBPOENA DIRECTED TO MOSES TAYLOR HOSPITAL**

Plaintiff, Aetna<sup>1</sup> respectfully moves this Court to compel non-party Moses Taylor Hospital (“the Hospital”) to comply with a Subpoena to produce documents, information, or things. The Subpoena is attached hereto as Exhibit “1”. The Hospital is refusing to provide adequate responses to the Subpoena and to produce all responsive documents pursuant to the Subpoena, despite extensive efforts by Aetna to have the Hospital comply with it. The arguments in support hereof are set forth more fully in Aetna’s attached Memorandum of Law.

---

<sup>1</sup> Aetna Inc., Aetna Health, Inc., Aetna Health Management, LLC and Aetna Life Insurance Company.

WHEREFORE, Aetna respectfully requests that the Court direct the Hospital to fully comply with the Subpoena within twenty (20) days.

Respectfully submitted,

/s/ Mark J. Schwemler

MARK J. SCHWEMLER (PA 44544)  
ELLIOTT GREENLEAF P.C.  
925 Harvest Drive, Suite 300  
Blue Bell, Pennsylvania 19422

JOHN G. DEAN (PA 76168)  
ELLIOTT GREENLEAF P.C.  
201 Penn Avenue, Suite 202  
Scranton, Pennsylvania 18503

Dated: January 31, 2020

*Counsel for Plaintiffs*